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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91214874
Party	Defendant Abir Anwar
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Submission	Answer
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Date	05/02/2014
Attachments	20140502 Answer to Opposition.pdf(180795 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE  
TRADEMARK TRIAL AND APPEAL BOARD**

LORILLARD LICENSING COMPANY, LLC,

Opposer,

vs.

ABIR ANWAR

Applicant.

OPPOSITION NO.: 91214874

Application Serial No. 85/932156

**ANSWER TO OPPOSITION**

Abir Anwar (“Applicant”), through his undersigned attorney, hereby sets forth his Answer and Affirmative Defenses to the Notice of Opposition against Application Serial No. 85/932156 for registration of the mark “TRU-VAPOR”, as follows:

1. Applicant lacks sufficient knowledge or information to respond to the allegations set forth in Paragraph 1 of the Notice of Opposition and, therefore, denies the same.
2. Applicant admits the allegations set forth in Paragraph 2 of the Notice of Opposition.
3. Applicant lacks sufficient knowledge or information to respond to the allegations set forth in Paragraph 3 of the Notice of Opposition and, therefore, denies the same.
4. Applicant denies the allegations set forth in Paragraph 4 of the Notice of Opposition.
5. Applicant denies the allegations set forth in Paragraph 5 of the Notice of Opposition.
6. Applicant denies the allegations of Paragraph 6 of the Notice of Opposition.

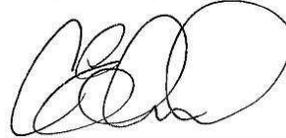
**AFFIRMATIVE DEFENSES**

7. The Notice of Opposition fails to state a claim upon which relief can be granted.
8. Applicant’s mark is not confusingly similar to any of Opposer’s trademarks.
9. Opposer’s claim that a likelihood of confusion exists is unfounded for several reasons, including the following:

- a. Applicant's mark is sufficiently unique to distinguish itself from any possible confusion with Opposer's trademarks; and
- b. Opposer's mark is not sufficiently strong, famous, or distinctive so as to cause consumers to confuse Applicant's mark with that of Opposer's.

WHEREFORE, PREMISES CONSIDERED, Applicant Abir Anwar prays that the Notice of Opposition and the relief sought by Opposer Lorillard Licensing Company LLC thereunder be denied and judgment rendered in favor of Applicant.

Respectfully submitted,



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**COUNSEL FOR APPLICANT**

**CERTIFICATE OF SERVICE**

I hereby certify that on May 2, 2014 a true and correct copy of the foregoing document was served on Opposer's counsel at the following address:

First Class Mail

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Christianne Edlund